

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOBIL CERRO NEGRO, LTD. )  
Plaintiff, )  
v. )  
PDVSA CERRO NEGRO S.A. )  
Defendant. )  
Civil Action No. \_\_\_\_\_  
**NOTICE OF MOTION TO  
ADMIT MARK A. MORAN  
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the annexed affidavit of Michael Miller in support of this motion and the Certificates of Good Standing annexed thereto, plaintiff Mobil Cerro Negro, Ltd. (“Mobil CN”) will move this Court, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Mark A. Moran, a member of the firm of STEPTOE & JOHNSON LLP, as attorney *pro hac vice* for Mobil CN in this matter.

Dated: New York, New York  
December 27, 2007

~~STEPTOE & JOHNSON PLLC~~

Bv:

Michael Miller (MM 4632)

750 Seventh Avenue, Suite 1900

New York, NY 10019

(212) 506-3900

*Attorney for Plaintiff Mobil Cerro Negro, Ltd.*